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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF NEVADA

12 In re
13 META MATERIALS INC.,
14 Debtor.

Case No.: 24-50792-hlb
(Chapter 7)

**DECLARATION OF JAMES W.
CHRISTIAN IN SUPPORT OF TRUSTEE
CHRISTINA LOVATO'S RESPONSE TO
DANIELLE SPEARS' EMERGENCY
MOTION TO INTERVENE, TO STAY
PROCEEDINGS, TO DISQUALIFY
CONFLICTED COUNSEL AND
TRUSTEE, AND TO RESET
BANKRUPTCY ADMINISTRATION
UNDER NEUTRAL AUTHORITY;
MOTION TO COMPEL DISCLOSURE,
VACATE UNLAWFUL PROTECTIVE
ORDERS, AND REFER FOR SANCTIONS
AND SPECIAL MASTER [ECF NO. 1988]**

Hearing Date: September 4, 2025
Hearing Time: 10:00 a.m.

22 James W. Chirstian, under penalty of perjury of the laws of the United States, declares:

23 1. I am an attorney in good standing with the State Bar of Texas since 1978. I am a
24 principal in the law firm Christian Attar located in Houston, Texas. I have personal knowledge of
25 the matters stated herein.

26 2. In 2023, my law firm was Christian Levine Group and teamed with Warshaw
27 Burstein to represent a group of investors in Next Bridge Hydrocarbons, Inc. (NBH"). The NBH
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1 investor group formed an entity, Flamethrower, LLC which was our client. The investigation
2 included review of potential issues including jurisdiction/venue, claims for relief, and suspected
3 trading day(s) activities. Consulting experts were engaged, DTCC records were compared to
4 Broadridge data, correspondence to FINRA was processed and evidence-preservation letters were
5 sent. At the conclusion of the investigation, Christian Levine and Warshaw Burstein determined
6 that evidence was insufficient to file §10(b)(5) of the Securities Exchange Act of 1934.

7 3. My first involvement with Meta Materials, Inc. ("Meta") was also in 2023.
8 Christian Attar was engaged to represent Meta on issues related to a variety of securities issues. A
9 substantial due diligence package was prepared; however, the company declined to pursue the
10 matter further.

11 4. Several years ago, a 'Go Fund Me' account was established to raise monies to
12 create a corporate vehicle for investigating potential violations by participants in the publicly
13 traded securities marketplace. I was not involved in establishing the account. The result was an
14 entity identified as The Naked Truth, Inc. When I learned of the project, I offered to return all the
15 funds raised to the donors. The remaining monies were placed into an account over which I have
16 no authority or control. I am not now, nor have I ever been, an officer, director or shareholder in
17 The Naked Truth, Inc.

18 5. I interacted with Mr. Valinoti approximately 15 years ago but have never paid Mr.
19 Valinoti any amount of money for providing clients.

20 6. Since employment by Trustee Lovato in this matter, my firm Christian Attar, the
21 firms of Kasowitz, Benson & Torres, and Schneider Wallace Cottrell & Konecky have engaged in
22 significant efforts with experts funded by Parabellum Capital, to refine the types of trading
23 information being sought in Trustee Lovato's ongoing discovery efforts. At this stage, we are
24 focusing primarily on (We explain – failure to deliver stock, spoofing and other forms of market
25 manipulation.
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1 7. I have utilized Parabellum Capital in multiple market manipulation cases.
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3 DATED: August 21, 2025.

4 /s/ James W. Christian
5 James W. Christian, Esq.
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